



# AMERICAN ASSOCIATION OF SWINE PRACTITIONERS

902 1ST. STREET • PERRY, IA 50220  
PHONE 515-465-5255 • FAX 515-465-3832  
E-MAIL aasp@netins.net

September 29, 1999

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852

Re: Animal Drug Availability Act; Veterinary Feed Directive  
(Docket No. 96N-0411)

Dear Sir or Madam:

The American Association of Swine Practitioners is a professional organization with a membership of over 1,100 veterinarians in the US. AASP's members have an abiding interest in swine health and production. The health of the national swine herd is dependent upon the availability of animal drugs. Such availability is also critical to maintaining a healthy and safe supply of pork for the consuming public.

The AASP is submitting comment in response to the proposed rule implementing the Veterinary Feed Directive (VFD) drugs section of the Animal Drug Availability Act (ADAA) of 1996.

To reiterate our previous comments of January 20, 1997 on Docket No. 96N-0411, it is imperative that the VFD rule allows flexibility in the content of the VFD in order to be practical in its application to the various types of production systems. A single VFD must be allowed to apply to multiple production groups of pigs when appropriate. Production records can provide proper identification and tracking of medicated pigs within a system. The issuance of a VFD for every group of pigs is neither practical nor feasible. It would add unnecessary cost to pork production while providing no additional safeguards for animal or public health. Such a requirement could actually jeopardize animal health if treatment were to be delayed.

Practitioner discretion can be effectively used in determining the stages of production that are at risk for disease. However, the application of a single VFD covering multiple production groups should not be misconstrued as advocating for continual use of a VFD

96n-0411

C15

11359 99 SEP 30 AM 102

drug in a given pig or group of pigs. Label directions will still need to be explicitly followed in determining the appropriate use of the VFD drug.

The expiration date on the VFD can serve as an effective control of usage. This date could be up to six (6) months in the future, depending upon the professional judgment of the veterinarian within the valid veterinarian-client-patient relationship. The specific treatment demands of each client's production system require flexibility in the timing and efficient application of treatment regimens.

The proposed rule only allows for transmission via facsimile. The AASP urges the FDA to consider the use of other electronic methods of transmission. A specific example would be a web-based server that would require the use of secure user (veterinarian-owned) accounts utilizing user-names, passwords, and electronic signatures. Such a system is currently under development for interstate health certificates. There may be other new and novel technologies. The FDA should remain open to such innovations.

Thank you for the opportunity to comment on the VFD proposed rule.

Sincerely,

A handwritten signature in black ink that reads "Tom Burkgren". The signature is written in a cursive, flowing style.

Tom Burkgren, DVM, MBA  
Executive Director

**Place Labels in This Space**

**Options:** ☒ UPS Tracking Label and your address label

Place the Tracking Label

Stamp your UPS Shipp

☒ UPS Air Shipping Document

☒ UPS Waybill

**UPS Next Day Air**  
**UPS Worldwide Express**  
Shipping Document

**UPS DRIVER**

- RECORD 6-DIGIT UPS SHIPPER NUMBER FROM BOX 1.
- If Box 1 IS BLANK OR THE NUMBER IS MORE THAN 6 DIGITS, RECORD THE NUMBER FROM BOX 2.

SHIPMENT FROM

UPS SHIPPER NO. **1** 9952219165 **2**

REFERENCE NUMBER

TELEPHONE

DR. TOM BULKREN 515-465-5352

A.A.S.D.

702 1<sup>st</sup> STREET

PERRY IOWA 56520

DELIVERY TO

TELEPHONE

DOUGLAS MOUNT BR. (301) 327-6651  
(HFA-305)

FOOD & DRUG ADMINISTRATION

5630 FISHERS LANE ROOM 1061

ROCKVILLE MD

WEIGHT AND ZONE	WEIGHT	DIMENSIONAL WEIGHT	ZONE
	LTR		

☒ NEXT DAY AIR

☐ WORLDWIDE EXPRESS (INTERNATIONAL)

☐ DOCUMENTS ONLY

☐ SATURDAY PICKUP

☐ SATURDAY DELIVERY



N151 0832 25 3

N151 0832 25 3



N151 0832 25 3

☐ BILL RECEIVER

UPS USE FOR INTERNATIONAL SHIPMENTS

**ups UPS Next Day Air** EXTREMELY URGENT **1**

N151 0832 25 3



N151 0832 25 3

TRACKING NUMBER

DATE OF SHIPMENT

4/26/97

010191120 9/95 M

United Parcel Service, Louisville, KY

International Shipping Notice - Carriage hereunder may be subject to the rules relating to liability and other terms and/or conditions established by the Convention for the Unification of Certain Rules Relating to International Carriage by Air (the "Warsaw Convention") and/or the Convention on the Contract for the Carriage of Goods by Road (the "CMR Convention"). These commodities, technology or software were exported from the U.S. in accordance with the Export Administration Regulations. Diversion contrary to U.S. law prohibited. For stopping places, call 1-800-782-7892.